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*In Propria Persona*

UNITED STATES DISTRICT COURT FOR  
THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

**TODD R. G. HILL, et al,**

**Plaintiffs**

**vs.**

**THE BOARD OF DIRECTORS,  
OFFICERS AND AGENTS AND  
INDIVIDUALS OF THE PEOPLES  
COLLEGE OF LAW, et al.,**

**Defendants.**

CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

**The Hon. Josephine L. Staton**  
Courtroom 8A, 8th Floor

**Magistrate Judge Brianna Fuller Mircheff**  
Courtroom 780, 7th Floor

**PLAINTIFF'S SUPPLEMENTAL NOTICE  
OF PROCEDURAL PRESERVATION AND  
PATTERN OF RECORD SUPPRESSION**

**NO ORAL ARGUMENT REQUESTED**

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**PLAINTIFF'S SUPPLEMENTAL NOTICE OF PROCEDURAL PRESERVATION AND PATTERN OF  
RECORD SUPPRESSION**

CASE 2:23-CV-01298-JLS-BFM

**PLAINTIFF’S SUPPLEMENTAL NOTICE OF PROCEDURAL PRESERVATION  
AND PATTERN OF RECORD SUPPRESSION**

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff Todd R.G. Hill respectfully submits this supplemental notice to preserve the procedural record and to document the facial appearance of a recurring pattern of selective docketing and suppression of Court-authorized or timely filed materials that materially impact dispositive motion practice and the fairness of the judicial process.

The procedural record reflects a pattern of non-chronological docket processing that disproportionately disadvantaged Plaintiff. This irregular docketing sequence created the false impression that Plaintiff’s filings had not been submitted, were procedurally defective, or not subject to timely review when in fact they were timely, complete, and trackable through EDSS confirmation.

In contrast, multiple defense filings, including a late declaration, errata, and reply briefs, have been consistently processed and docketed within hours of submission, as reflected in Dockets 285, 299, and 300 under principles of deference. These filings have proceeded unimpeded, without the need for procedural clarification or supplemental notice. Except for the Court’s order granting Plaintiff leave to file a surreply (Docket 289), there has been no comparable sua sponte action taken to preserve the integrity of Plaintiff’s record or to ensure factual parity in motion practice. The absence of corrective or balancing measures, particularly in the face of withheld or delayed Plaintiff filings, underscores a systemic asymmetry that has materially impacted the appearance and reality of procedural neutrality.

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1 Plaintiff notes that the Court previously granted Plaintiff limited filing privileges under PACER,  
2 which were subsequently revoked by Magistrate Judge Mircheff based on the characterization that  
3 Plaintiff's filings were "problematic." While Plaintiff did not contest that order, the revocation  
4 contributes to the appearance that Plaintiff's filings have been institutionally disfavored and  
5 procedurally marginalized.  
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8 While the Court granted leave for a surreply under Docket 289, the resulting filing was  
9 procedurally sidelined until Plaintiff intervened. This functional suppression, absent explanation,  
10 contributes to the appearance that Plaintiff's filings are being treated as problematic or disfavored.  
11

12 Notably, the Court consistently failed to docket Plaintiff's authorized or time-sensitive  
13 submissions until Plaintiff filed formal notices or tracking-based objections. In the most recent  
14 context the Court-authorized surreply submitted on May 7, 2025 pursuant to Docket 289, for  
15 example, was withheld from the docket for five days and only entered on May 12, 2025 as Docket  
16 305, following Plaintiff's procedural alert in Docket 302. This pattern of suppression-by-delay  
17 functionally denied Plaintiff rebuttal visibility during critical phases of motion practice and materially  
18 shaped the procedural narrative in favor of Defendants. Such selective docketing practices, especially  
19 when repeated, raise structural due process concerns and warrant post-judgment relief under Federal  
20 Rule of Civil Procedure 60(b).  
21

22  
23 This withholding followed an earlier pattern of suppression and delayed rulings, including (but  
24 not limited to) Plaintiff's filings submitted requesting judicial notice that, as was the case for Dockets  
25 197 and 199, were unopposed and remained outstanding substantive adjudication for protracted  
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1 periods greater than 6 months. Each contained material objections and supplemental evidentiary  
2 context.  
3

4 In contrast, multiple defense filings, including late declarations, errata, and improper replies, have  
5 been processed and docketed within hours, including Dockets 285, 299, and 300. None of these  
6 filings have been processed by the Court in sua sponte fashion and, with the lone exception of the  
7 grant of Plaintiff's request for surreply, the Court has not taken action to properly preserve the record  
8 for factual fairness or neutrality.  
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10 Taken together, these incidents reflect more than administrative backlog. They constitute a  
11 pattern of procedural withholding and selective docketing that materially alters the scope of record-  
12 based adjudication. The resulting asymmetry artificially elevates Defendants' filings while restricting  
13 Plaintiff's ability to present authorized rebuttal and supporting materials. Any ruling issued without  
14 consideration of these timely submissions would inevitably rest on a procedurally incomplete record  
15 and constitute a structurally deficient adjudication subject to challenge under Federal Rule of Civil  
16 Procedure 60(b)(1), (2), and (6).  
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20 Plaintiff respectfully preserves all objections to judicial consideration of any materials submitted  
21 during this suppression window, and reserves his rights to seek relief from any resulting judgment  
22 obtained under these procedurally imbalanced conditions.  
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24 Plaintiff acknowledges the importance of judicial efficiency and recognizes the Court's discretion  
25 in managing its docket. Nonetheless, where the pattern of delay or omission directly distorts the  
26 record upon which dispositive rulings are based, such omissions implicate not just timing, but  
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1 fairness, process, and the appearance of impartial adjudication. Plaintiff submits this notice to  
2 preserve the integrity of the record and to ensure that any judgment issued is grounded in the full  
3 scope of materials properly before the Court.  
4

5 Plaintiff respectfully anticipates that the Court may, when issuing rulings on the pending motions,  
6 seek to characterize the delayed docketing or omission of filings as non-prejudicial or “harmless  
7 error.” Plaintiff objects in advance to any such characterization. The record demonstrates that the  
8 filings at issue, particularly the Court-authorized surreply (Docket 305), as well as earlier judicial  
9 notice and evidentiary submissions, were timely, material, and directly relevant to dispositive  
10 matters. The delayed or withheld consideration of these filings impeded Plaintiff’s ability to rebut  
11 contested factual assertions and to fully present arguments on the merits. Any subsequent ruling that  
12 fails to account for the procedural impact of these omissions would necessarily rest on a structurally  
13 incomplete record. Plaintiff submits this paragraph to preserve his objection to any such post hoc  
14 framing and to ensure that the record reflects both the occurrence and significance of the procedural  
15 discrepancies outlined herein.  
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19 Respectfully submitted,  
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21 Dated: May 13, 2025  
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Todd R. G. Hill  
Plaintiff, Pro Se

**STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**

The undersigned party certifies that this brief contains 803 words, which complies with the 7,000-word limit of L.R. 11-6.1.

Respectfully submitted,



May 13, 2025  
Todd R.G. Hill  
Plaintiff, in Propria Persona

**Plaintiff's Proof of Service**

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P.

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1 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal  
2 Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.  
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4 Respectfully submitted,

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8 May 13, 2025  
9 Todd R.G. Hill  
10 Plaintiff, in Propria Persona  
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